

# **EXHIBIT B**



Clover Management, Inc.  
348 Harris Hill Road  
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April 16, 2024

**VIA EMAIL**

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Re: Preliminary Injunction (“**Preliminary Injunction**”) ordered on March 4, 2024 by Judge Michael J. Roemer, U.S. Magistrate Judge of the U.S. District Court for the W.D.N.Y in CFPB, et al. v. Stratfs, LLC, et al.

Case No. 1:24-cv-00040-AW-MJR (W.D.N.Y.)

Dear Receiver, Plaintiffs, Mr. Behar, and Mr. Sasson:

This letter is in response to correspondence from Vanessa Buchko of the Consumer Financial Protection Bureau (“**CFPB**”) dated April 11, 2024 delivered via email on April 11, 2024. All capitalized terms not otherwise defined herein shall have the meaning ascribed in the Preliminary Injunction.

In compliance with the Preliminary Injunction, please be advised as follows:

1. Records available to Clover Management, Inc. (“**Clover**”) indicate that as of April 15, 2024:
  - a. Blaise Investments LLC (“**Blaise**”), which is understood to be owned and controlled by Albert Ian Behar, owns a:
    - i. 5.34% Membership Interest in Clover Communities Fund IV, L.P. (“**Fund IV**”); and
    - ii. 4.08% Membership Interest in Clover Communities Fund V, LLC (“**Fund V**”).
  - b. Fusion Capital LLC (“**Fusion**”), which is understood to be owned and controlled by Ryan Sasson, owns a:
    - i. 2.67% Membership Interest in Fund IV.; and
    - ii. 4.08% Membership Interest in Fund V.
  - c. Axel Development Sag Harbor, LLC (“**Axel**”), which is understood to be owned and controlled by Ryan Sasson, owns an approximate 3.389% Membership Interest in Clover Communities Fund VI, L.P. (“**Fund VI**”).

Fund IV, Fund V and Fund VI are collectively referred to as the “**Funds**” and individually as a “**Fund**”.

2. Clover and its affiliates under common control do not maintain records nor hold any Asset controlled by or for the benefit of the Asset-Freeze Defendants other than those listed in numbered paragraph 1.

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3. Enclosed please find letters from the Funds in further response to the Preliminary Injunction.

Should you have any further questions or require anything further pursuant to the Preliminary Injunction, I can be contacted at the above telephone number and via email at [tbui@clovergorupinc.com](mailto:tbui@clovergorupinc.com).

Very truly yours,



Teia Marie Bui, Esq.  
General Counsel  
Clover Management, Inc.

Enclosures

CC:

**VIA U.S. MAIL**

Hon. Michael J. Roemer  
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